

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN THE MATTER OF: Jamie Lee House
Domita Tawnee House**

**CHAPTER 13
CASE #: 16-51076-KMS**

MOTION FOR CONTINUATION OF AUTOMATIC STAY

COME NOW the Debtors and hereby moves this Court, pursuant to Section 362(c)(3)(B), for an order continuing the automatic stay provided under Section 362(a) to all creditors. In support of this motion, the Debtors state as follows:

1. The Debtors filed a petition under Chapter 13 on June 27, 2016.
2. The Debtors had previously filed a chapter 13 case on March 30, 2015 (16-51076) which was dismissed on June 7, 2016.
3. This case has been filed in good faith. The Debtors believe that their chapter 13 plan should be confirmed and that they will be able to fully perform their obligations under the terms of the plan.
4. The Debtors' prior chapter 13 case, dismissed on June 7, 2016, which as the only previous case by the debtors that was pending during the preceding year.
5. The Debtors' prior chapter 13 case was not dismissed for failure to file or amend their petition or any required documents, nor a failure to provide adequate protection ordered by the court.
6. The Debtors' prior chapter 13 case was not dismissed at a time when there had been a motion for relief pending before the court nor resolved with an order terminating, conditioning or limiting the stay.
7. Debtors pray for general relief.

WHEREFORE, the Debtors request that this Court continue the automatic stay under Section 362(a) as to all creditors for the duration of this chapter 13 proceeding, or until such time as the stay is terminated under Section 362(c)(1) or (c)(2), or a motion for relief is granted under Section 362(d).

RESPECTFULLY submitted, this the 28th day of June, 2016 .

/s/ John Gadow
John Gadow, MSB 9644
ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I, John Gadow, Attorney for the above listed debtor, do hereby certify that I have this date served electronically, a true and correct copy of the above Motion for Continuation of Automatic Stay and Declaration in Support of the Motion for Continuation of Automatic Stay to U. S. Trustee, USTPRegion08.JA.ECF@usdoj.gov and mailed, postage prepaid, to All Creditors at their respective addresses on the attached mailing matrix.

THIS THE 28th day of June, 2016.

/s/ John Gadow

John Gadow, MSB 9644

GADOW TYLER PLLC

511 EAST PEARL STREET

JACKSON, MISSISSIPPI 39201

TELEPHONE. (601) 355-0654

FACSIMILE (601) 510-9667

EMAIL: btyler@pgtlaw.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

In Re: Jamie T. House
Domita Tawnee House
Debtors

Case No.: 16-51076-KMS
Chapter 13

DECLARATION IN SUPPORT OF MOTION TO EXTEND
THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. 362(c)(3)

The debtor(s) , in support of the Motion to Extend the Automatic Stay, states as follows:

1. We have personal knowledge of the facts listed in the foregoing situation.
2. We are over the age of 18, of sound mind, am capable of making this Declaration, and are fully competent to testify to the matters stated herein.
3. We filed this bankruptcy petition on June 28, 2016.
4. We previously filed bankruptcy, 15-50532-KMS Under Chapter (13) on March 30, 2015 and that case was dismissed on June 7, 2016.
5. We have had no other pending bankruptcy cases in the proceeding one-year period.
6. We have not had any prior case(s) dismissed in the past year for any of the following reasons:
 - failure to file or amend the petition or other required documents without substantial excuse;
 - failure to provide adequate protection as ordered by the Court; or
 - failure to perform the terms of a plan confirmed by the Court.
7. We have had a substantial change in my financial or personal affairs since the dismissal of the last case, and We believe that this case will:
 - (If a Chapter 7) be concluded with a discharge; or
 - (If a Chapter 11 or 13) result in a confirmed plan that will be fully performed.

8. Those changes are as follows:

Debtors became delinquent on their Chapter 13 Plan payments.
Debtors could not become current.

Janie was out of work and got behind on the payments. Debtors believe that there will be an agreement with Tim Walby modify their mortgage removing it from the plan and making them current while losing their paych

Check the appropriate box:

☒ If executed within the United States, its territories, possessions or commonwealths:

I declare under penalty of perjury that the foregoing is true and correct.

☐ If executed outside the United States:

(I/We) declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: 6/28/16
Date

Janie House
Debtor's Signature

Executed on: 6/28/16
Date

Doneta House
Joint Debtor's Signature (if applicable)

Label Matrix for local noticing
0646-1
Case 16-02060-jwb
Western District of Michigan
Grand Rapids
Tue Jun 28 16:39:00 EDT 2016

ARS
P.O. Box 156
East Amherst NY 14051-0156

AmeriCredit Financial Services, Inc. dba GM
P O Box 183853
Arlington, TX 76096-3853

Access Receivables
PO Box 1377
Cockeysville MD 21030-6377

Western District of Michigan
One Division Ave., N.
Room 200
Grand Rapids, MI 49503-3132

Advance America
2013 28th St.
Wyoming MI 49519-2515

CBCS
PO Box 2334
Columbus OH 43216-2334

Capital One Bank USA NA
PO Box 6492
Carol Stream IL 60197-6492

(p)CAPITAL ONE
PO BOX 30285
SALT LAKE CITY UT 84130-0285

CarbsAlvarado LW
Mary Schierholt
202 S. Harrison St.
Ludington MI 49431-2110

Care Credit
PO Box 960061
Orlando FL 32896-0061

Carson Smithfield
P.O. Box 660702
Dallas TX 75266-0702

Cash Advance
Advance America
2165 W. Vienna Road
Clio MI 48420-1757

Cash Store
1209 28th St. SW
Wyoming MI 49509-2701

Cb Manistee
Po Box 638 323 River St
Manistee MI 49660-0638

Cbm Collectn
300 Rodd St. Suite 202
Midland MI 48640-6599

Chartel
8413 Excelsior Dr. Ste 120
Madison WI 53717-1970

Check n Go
Collections Department
4540 Cooper Road
Ste 305
Cincinnati OH 45242-5649

City of Ludington
4005 Harrison St.
Ludington MI 49431

Convergent Outsourcing
800 SW 39th ST
Renton WA 98057-4975

Credence Resource Mana
17000 Dallas Pkwy Ste 20
Dallas TX 75248-1940

Dish Network
Dept 0063
Palatine IL 60055-0001

Dte Energy
1 Energy Plz # Wcb2106
Detroit MI 48226-1221

ECSI
PO Box 105765
Atlanta GA 30348-5765

Eastern Account System
75 Glen Rd Ste 310
Sandy Hook CT 06482-1175

Edfinancial Services L
120 N Seven Oaks Dr
Knoxville TN 37922-2359

Fifth Third Bank
W. 5870 US 10
Ludington MI 49431-2450

GM Financial
PO Box 78143k
Phoenix AZ 85062

Global Payments Check
PO Box 59371
Chicago IL 60659-0371

Global Trust Management
PO Box 26244
Tampa FL 33623-6244

Gm Financial
Po Box 183834
Arlington TX 76096-3834

Great Lakes Collection Agency
PO Box 638
Manistee MI 49660-0638

HSBC
HSBC Card Services
Attn: Bankruptcy Department
PO Box 5213
Carol Stream IL 60197-5213

(p)HSBC BANK
ATTN BANKRUPTCY DEPARTMENT
PO BOX 5213
CAROL STREAM IL 60197-5213

IC Systems
444 Highway 96 E.
PO Box 64794
Saint Paul MN 55164-0794

(p)INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

John Raymon
PO Box 315
Cadillac MI 49601-0315

LJ Ross
PO Box 6099
Jackson MI 49204-6099

Mason County Treasurer
304 E. Ludington Ave.
Ludington MI 49431-2121

Mercantile Adjustment
PO Box 9054
Buffalo NY 14231-9054

Merrick Bank
Po Box 9201
Old Bethpage NY 11804-9001

Midland Funding
2365 Northside Dr Ste 30
San Diego CA 92108-2709

Philips & Cohen Associates,
Mail Stop: 146
1002 Justison St.
Wilmington DE 19801-5148

(p)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

Seventh Avenue
1112 7th Ave
Monroe WI 53566-1364

(p)SPRINT NEXTEL CORRESPONDENCE
ATTN BANKRUPTCY DEPT
PO BOX 7949
OVERLAND PARK KS 66207-0949

State of Michigan
Collection Division
PO Box 30158
Lansing MI 48909-7658

State of Michigan
Department of Treasury
Lansing MI 48922-0001

Synch/Care Credit
950 Forrer Blvd
Kettering OH 45420-1469

Synch/Walmart
Po Box 965024
Orlando FL 32896-5024

TRS
5251 Westheimer
Houston TX 77056-5416

U S Dept Of Ed
2505 S Finley Rs Ste100
Lombard IL 60148-4867

US Department of Education
c/o ECSI Federal Perkins Loan Servicer
P O Box 1079
Wexford PA 15090-1079

Us Dep Ed
Po Box 5609
Greenville TX 75403-5609

Us Dept Ed
181 Montour Run Ro Dept Of Ed Product
Coraopolis PA 15108

Christina Margareta Gardner
4240 Alphenhorn NW
#8
Comstock Park, MI 49321-8705

Jeff A. Moyer
PO Box 337
Grandville, MI 49468-0337

Jeffrey R. Portko
Advocate Law Offices
1430 Michigan St, NE
Grand Rapids, MI 49503-2035

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Capital One Bank Usa N
15000 Capital One Dr
Richmond VA 23238

HSBC
PO Box 15524
Wilmington DE 19850

Internal Revenue Service
PO Box 219236
Kansas City MO 64121

Portfolio Recovery Association
120 Corporate Blvd.
Ste. 1
Norfolk VA 23502

Sprint
PO Box 4191
Carol Stream IL 60197

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) Philip St Cohen Assoc.
1002 Justison St.

End of Label Matrix	
Mailable recipients	57
Bypassed recipients	1
Total	58